



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

Gus Pomeroy, Treasurer
Idaho Republican Party Federal
Campaign Account
P.O. Box 2267
Boise, ID 83701

DEC 21 1994

Identification Number: C00170175

Reference: 12 Day Pre-General Report (10/1/94-10/19/94)

Dear Mr. Pomeroy:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-In order for your report to be considered complete, a Detailed Summary Page must be filed. 2 U.S.C. §434(b)

-Schedule H4 discloses a disbursement(s) which is categorized as direct candidate support; however, a Schedule H2 has not been filed to disclose the allocation ratio. All committees are required to allocate the payment for direct candidate support in which the committee collects both federal and non-federal funds. The costs are allocated according to the time and space method or funds received ratio and reported on Schedule H2. 11 CFR §§106.5(f) and 106.6(d). Please file a Schedule H2 to disclose the ratio for the direct candidate support activity.

-Your calculations for Administrative/Voter Drive EVENT YEAR-TO-DATE totals are incorrect. EVENT YEAR-TO-DATE totals for administrative and voter drive costs are derived by aggregating all disbursements during the calendar year within the category. EVENT YEAR-TO-DATE totals for fundraising, direct candidate support, and exempt activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous EVENT YEAR-TO-DATE total for that category or event. This running EVENT YEAR-TO-DATE total should be disclosed after each disbursement is listed. Please amend your report by providing the correct Administrative/Voter Drive EVENT YEAR-TO-DATE totals.

-Please clarify all expenditures made for WRC Advertising on Schedule H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedule E or F supporting Line 23 or 24 and include the amount, name, address and office sought by each candidate. 11 CFR §104.3(b)

-Contributions to federal candidates do not qualify as shared expenses which may be allocated between your federal and non-federal accounts. Contributions to federal committees should be wholly paid for by the federal account, disclosed on a Schedule B for Line 23 of the Detailed Summary Page. For your information, direct candidate support activities are allocable activities that include expenditures made on behalf of more than one clearly identified federal candidate, for example, publications or broadcast communications 11 CFR 106.1(a).

The Commission recommends that you immediately transfer the funds received by your federal account relating to the allocated contributions (i.e. "direct candidate support") back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Erica D. Holder

Erica Holder
Reports Analyst
Reports Analysis Division

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